

**City and County of Honolulu  
Department of Transportation Services  
Public Transit Division**

**2019  
Limited English Proficient Plan  
(LEP Plan)**

## **Contents**

<b>I.</b>	<b>Introduction</b>	<b>2</b>
<b>II.</b>	<b>Definition of a Limited English Proficient Person</b>	<b>2</b>
<b>III.</b>	<b>Elements of the Plan for Limited English Proficient Persons</b>	<b>2</b>
	<b>a. Four Factor Analysis Results</b>	<b>2</b>
	<b>b. Language Assistance Services</b>	<b>6</b>
	<b>c. Providing Notice to LEP Persons of Language Assistance</b>	<b>7</b>
	<b>d. Monitoring and Updating the LEP Plan</b>	<b>8</b>
	<b>e. Employee Training to Provide Language Assistance</b>	<b>8</b>
	<b>Table 1: Speak English Less than Very Well</b>	<b>3</b>
	<b>Table 2: Other Languages</b>	<b>4</b>
	<b>Table 3: Public Transit LEP Ridership</b>	<b>4</b>

## **I. Introduction**

The Department of Transportation Services (DTS) of the City and County of Honolulu and its contracted operator of public transit services, O'ahu Transit Services, Inc. (OTS) are committed to providing meaningful access to all patrons and users of Honolulu's public transit system who are Limited English Proficient (LEP).

The 2019 LEP Plan (Plan) was developed in accordance with the Federal Transit Administration (FTA) Circular FTA C 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients dated October 1, 2012 (Circular). The Plan identifies the prevalent languages of LEP persons likely to be public transit users and specifies the types of language assistance services that DTS provides. DTS and OTS are committed to providing language assistance services for all LEP transit users to the maximum extent feasible.

## **II. Definition of a Limited English Proficient Person**

The Circular defines an LEP person as a person for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all. Hawaii Revised Statute Section 321-C-2 defines LEP person as "an individual who, on account of national origin, does not speak English as the person's primary language and who self identifies as having a limited ability to read, write, speak, or understand the English language".

## **III. Elements of the LEP Plan**

This section contains the essential elements prescribed under the Circular. DTS, OTS, and subrecipients who do not develop their own plans are responsible for implementing this LEP plan.

### **a. Four Factor Analysis (FFA) Results**

Using the 2018 TheBus Fare and Demographic Ridership Survey (Survey), the FFA identified the proportion of LEP persons who self-identified as not speaking English well. The on-board survey was conducted on all 104 bus routes during November/December 2018 and focused on rider demographics, travel patterns, ability to speak English well, and fare usage. A copy of the Survey can be found at: <http://www.honolulu.gov/cms-dts-menu/site-dts-sitearticles/908-dite-dts-ptd-cat/32230-language-assistance.html>.

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.**

The Survey was used to identify LEP individuals that use DTS-PTD public transit services. According to the data, 10% do not speak English well. See Table 1 below:

<b>Table 1: Survey Question: How well do you speak English?</b>	
Speak English well	90%
Does not speak English well	10%
Total	100%

Of the people who do not speak English well, the four (4) languages most frequently spoken are: (see Table 2 below)

- Filipino/Tagalog/Ilocano (53.4%)
- Japanese (14%)
- Micronesian/Chuukese (12%)
- Chinese/Mandarin (5.4%)

Table 2: Languages Spoken by LEP Survey Riders		Table 3: Public Transit LEP Ridership		
Language	LEP Total %	6,630 x 5% = 332	66,296 x 10% = 6,630 LEP Ridership	
		Safe Harbor	LEP Total	LEP Total %
Language	%		6,630	100%
***Chinese	4.0%		265	4.0%
**Chuukese	9.0%		596	9.0%
German	4.0%		265	4.0%
*Filipino	40.0%		2,652	40.0%
Hawaiian	3.0%		199	3.0%
Japanese	14.0%		928	14.0%
Korean	1.4%		93	1.4%
Kosraean	1.4%		93	1.4%
*Mandarin	1.4%		93	1.4%
Mexican	4.0%		265	4.0%
**Micronesian	3.0%		199	3.0%
Chavacano	1.4%		93	1.4%
*Ilocano	6.0%		398	6.0%
*Ilocano/Tagalog	1.4%		93	1.4%
*Tagalog	6.0%		398	6.0%
Total	100.0%		6,630	100.0%
***Chinese+Mandarin= 358 or 5.4% **Chuukese+Micronesian= 795 or 12% *Filipino+Ilocano+Tagalog=3,541 or 53.4% Japanese= 928 or 14%				

**Factor 2: The frequency with which LEP persons come into contact with the program.**

According to the 2017 National Transit Database, Honolulu's annual public transit ridership was 65.3M unlinked trips (passenger boardings) or approximately 179,000 daily unlinked trips. Based on the Survey's 2.7 daily average of unlinked trips per rider, daily ridership is 66,296 people and 10% or 6,630 riders do not speak English well. See Table 3 above.

Applying the percentages in Factor 1 to the 6,630 LEP persons, the prevalent languages of the people who do not speak English well are:

- Filipino/Tagalog/Ilocano (3,541 or ≈ 53.4%)
- Japanese (928 or ≈ 14%)

- Micronesian/Chuukese (795 or  $\approx 12\%$ )
- Chinese/Mandarin (358 or  $\approx 5.4\%$ )

Under the Safe Harbor Provision, LEP obligations include languages that constitute 5% or 1,000 persons, whichever is less of the people (6,630) who may use or have contact with public transit services and who do not speak English well. The 5% threshold is 332 persons.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.**

Public transportation is a vital service for many people who are unable to drive for various reasons and those who do not have access to personal vehicles. They depend on the public transit system to take them to where they need to go for work, school, shopping, medical, recreation, and visiting friends and families. Therefore, providing language assistance for LEP public transit users is an important service to ensure they are able to understand how to use the public transit system to their advantage and benefit.

According to the Survey's data for LEP persons:

- 18% are totally dependent upon TheBus and would not be able to make their trip(s) if TheBus did not operate.
- 71% do not have a driver's license.
- 52% make less than \$25K annually.
- 92% of the ridership base are Non-Caucasian.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.**

DTS-PTD's annual operating budget includes funding for:

- Phone interpretation services: Professional phone interpretation services
- Translation services: Professional translation services
- Printing: Vital documents in identified languages
- Signage: In identified languages as applicable and necessary
- Advertisement: Notices in identified language publications as applicable and necessary
- Consultants: Professional services contracted as applicable and necessary to meet LEP requirements
- Other available resources:
  - Phone interpretation services: In-house staff, other government & non-profit agencies.
  - Partnering with other State, County, and non-profit agencies to provide transit information to the LEP community (i.e. State Office of Language Access, Citizen Corps language cards).

- Translation services: In-house staff, other government & non-profit agencies.

## **b. Description of Language Assistance Services**

### **• Types of Language Services Available**

Bus Information, Bus Customer Service, and Bus Pass Offices; Handi-Van Reservations; and Handi-Van Eligibility Center all utilize an interpreter service vendor to provide services to non-English speaking customers. These include Pacific Interpreters (primary) and Corporate Translation Services (CTS) Language Links (secondary).

### **• How Staff Can Obtain These Services**

All service staff members have access to the interpreter vendor telephone numbers and codes.

### **• Responding to LEP Callers**

1. Ascertain if the caller has any English comprehension to use simplified English.
2. If unable to use simplified English, ascertain the country of origin and/or language dialect to utilize in-house interpreter resources.
3. If unable to identify language or no in-house resource, call the interpreter vendor to provide language assistance via three-way conversation, LEP caller, staff member, and interpreter.

### **• Responding to Written Communication from LEP Persons**

1. Identify language and ascertain if there are in-house staff for that language. OTS currently has Ilocano, Tagalog, Japanese, and Chinese, written and spoken language proficient employees.
2. If no in-house staff, use translation vendor.

### **• Responding to In-Person Contact with LEP Persons**

1. Identify language with language poster or cards.
2. Call interpreter vendor to provide language assistance via two-way conversation if no in-house resource.

### **• Ensuring Competency of Interpreters and Translation**

1. Vendors are selected from the State of Hawaii Price and Vendor List Contracts. There is a screening and credentialing process for interpreter vendors.

2. OTS in-house staff is experienced with years of service.
3. Other agency resources are the Consulates and State Office of Language Access.

- **Documents Considered Essential for Translation**

DTS considers the following vital documents essential for translation.

TheBus documents include:

- Notifying the Public of Rights Under Title VI notice
- Non-Discrimination Complaint Form
- “You Have Rights” car card referencing Title VI and Environmental Justice
- Lost and Found Notification
- Annual Bus Pass Application
- Senior Citizen Bus Pass Application
- Senior Citizen Annual Bus Pass Renewal Application
- Person with a Disability Bus Pass Application
- Request for Refund/Exchange/Adjustment
- Bus Pass Subsidy Program Application

TheHandi-Van documents include:

- Notifying the Public of Rights Under Title VI notice
- Non-Discrimination Complaint Form
- Rider’s Guide
- Eligibility Information Brochure

All documents are translated in languages identified in the FFA and are available in hard copy, electronic format, or can be requested via email ([thebustop@honolulu.gov](mailto:thebustop@honolulu.gov)), telephone (768-8374), or in person at DTS or TheBus Pass/Customer Service Offices.

- **Subrecipient Monitoring**

DTS staff monitors its subrecipients on an annual basis to ensure compliance with FTA LEP requirements through on-site visits and desk reviews of requested documents and records.

### **c. Providing Notice to LEP Persons of Assistance**

DTS and OTS communicate with LEP populations by posting notices/signs, online information, and outreach documents in languages identified in the FFA;



and networking with community-based organizations and social service agencies.

TheHandi-Van Eligibility Center communicates with LEP populations by posting signs in its office and through outreach documents.

**d. Monitoring and Updating the Plan**

Monitoring and updating the Plan will be conducted during the 3-year interval preceding the Title VI Program submission year to FTA in accordance with the FTA Circular. DTS will review and assess Plan applicability, availability of resources (staff, partner agencies, funding), LEP population needs, complaint logs, the most current data (i.e. Census/American Community Survey/State Databook), and relevant surveys/studies to complete Plan updates.

**e. Description of How the Recipient Trains the Employees to Provide Language Assistance**

DTS and OTS incorporate an LEP video presentation into operators' periodic training for correct handling of LEP riders and their safety. All other relevant employees are also required to view the LEP training video on an annual basis to ensure they possess the knowledge and skills required to provide timely and reasonable language assistance to the LEP population. Training information includes: DTS LEP Plan, local demographic LEP population data, Hawaii Language Access Law background, printed LEP population vital documents/materials, and handling requests in foreign languages.

TheHandi-Van Eligibility Center provides both initial and annual refresher training for all relevant employees that is focused on customer service and to ensure they possess the knowledge and skills required to provide timely and reasonable language assistance to the LEP population.